



U.S. Department of Justice

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May 16, 2017

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**RE: United States v. James Maxwell Barnett and Angela Parrott, Cause Number:**  
4:17CR00193 CDP/JMB

Dear Counsel:

As you are aware, your clients were charged by way of an indictment. In order to assist you in the determination of any relevant pre-trial motions to be filed in this case, the government notes that your clients made statements to law enforcement officials and had items seized from their person and property.

1. DISCOVERY - Pursuant to Rule 16, the government will be providing through the USAfx system the following items: photographs; gift cards and prepaid cards; personal documents regarding Angela Parrott; receipts from Arizona, Arkansas, Colorado, Kansas, Missouri, New Mexico, and, Oklahoma, ; arrest report; casino cards; Chesterfield police report; credit applications and notes; documents seized from Barnett; fraudulent identification documents; Colorado driver's license template; hotel cards; hotel receipts; insurance cards; James Barnett cards; JF credit inquiries; JF Walmart credit usage; JR Synchrony mailing; JR Target Mailing; JR Walmart Mailing; JR Walmart Statement; LH Best Western Receipt; Miscellaneous Cards; Norman, Oklahoma Report re PH; notebook; Saline County Sheriff's Report; seized cards with scans; volumes 1 and 2 of temporary credit accounts; trailer title and counterfeit bill; and criminal histories. The search warrant utilized by the City of Chesterfield will be forwarded under separate cover.

2. ELECTRONIC SURVEILLANCE – The Government did not utilize electronic surveillance.
3. CONFIDENTIAL INFORMANTS - The Government did not utilize a confidential informant.
4. JENCKS MATERIAL - The Government will make all JENCKS material available no later than the Friday preceding trial, conditioned upon the defendant's agreement to make available statements of defendant's witnesses at the same time.
5. GRAND JURY TRANSCRIPTS – The Government agrees to produce all Grand Jury transcripts to the extent they constitute JENCKS material and make them available for inspection.
6. OTHER CRIMES EVIDENCE - The Government advises the defendants that it intends to present evidence of defendants' involvement in the fraudulent scheme in New Mexico in December 2016. While the evidence that is set forth in the New Mexico search warrant and charges is part of the common scheme and plan, out of an abundance of caution, the government provides notice that the evidence is also admissible to prove opportunity, intent, preparation, plan, knowledge, and absence of mistake or accident.
7. STATEMENTS OF DEFENDANT – Any statements made by the defendants are recorded in the Chesterfield Police Report.
8. IDENTIFICATION OF DEFENDANT – The government is unaware of any post arrest identification of your client.
9. PHYSICAL EVIDENCE – Physical evidence was seized from your clients and their property.
10. FAVORABLE EVIDENCE - The Government agrees to furnish any and all favorable evidence to the defendants if and when its existence becomes known to the Government.

If you need any further specific information regarding the above matters, or any other matters which will prevent the filing and litigation of any unnecessary pretrial motions, please do not hesitate to call me.

In order to avoid the need of filing motions pursuant to Rules 16 and 26, the Government makes the following requests;

Pursuant to Rule 16(b)(1)(A), (B) and (C), Federal Rules of Criminal Procedure, the United States hereby requests that:

A. The defendant provide the United States, or permit the United States to inspect and copy or photograph books, papers, documents, photographs, tangible objects, or copies thereof, which are within the possession, custody or control of the defendant and which the defendant intends to introduce as evidence in chief at trial.

B. The defendant provide the United States, or permit the United States to inspect and copy or photograph any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with the particular case, or copies thereof, within the possession or control of the defendant, which the defendant intends to introduce as evidence in chief at the trial or which were prepared by a witness whom the defendant intends to call at the trial when the results or reports relate to his testimony.

C. The defendant provide the United States a written summary of the testimony that the defendant intends to use under Rules 702, 703, or 705, Federal Rules of Evidence, as evidence in trial, which includes a description of the witnesses' opinions, the bases and reasons for those opinions, and the witnesses' qualifications.

Further, pursuant to the provisions of Rule 26.2 the Government further requests the defendant and his attorney to provide to the Government any statement of defense witnesses that is in their possession and that relates to the subject matter concerning which the witness has testified.

The Government requests a response prior to the hearing date on the motions to establish whether it needs to file its request for a court order to enforce compliance.

I thank you in advance for your anticipated cooperation.

Very truly yours,

RICHARD CALLAHAN  
United States Attorney

s/ Tracy L. Berry  
TRACY L. BERRY  
Assistant United States Attorney